

20 July 2011

Please accept these comments on the proposed FCCC action to permit LightSquared to transmit high power radio waves from ground based towers distributed throughout the United States.

I am extremely concerned that, should FCC issue a permit to LightSquared, that thousands of dollars of equipment installed in my aircraft will become inoperable. Tests conducted by the GPS industry, the FAA, and others have demonstrated very significant signal degradation resulting from LightSquared tests. LightSquared's degradation of the GPS signal will impose severe financial hardship on me. My aircraft is equipped with an IFR GPS receiver. It is unconscionable that I would have to pay to correct a problem that LightSquared creates, and that LightSquared will earn obscene profits from.

My aircraft also has a 406 mhz emergency locator transmitter (ELT) that can be configured to transmit my precise location should I experience an in-flight emergency. This too will become inoperable. According to literature published by SARSAT and the Civil Air Patrol, GPS enhanced 406 mhz ELT narrows search areas from hundreds of square miles with 121.5 mhz ELT to a few hundred square meters. This significantly enhances prospects of survival for crash victims. How can the FCC even contemplate a unilateral action which would significantly degrade and possibly eliminate the efficacy of current generation ELT and EPIRB life saving beacons?

The costs imposed on innocent users of GPS equipment from an FCC decision to permit LightSquared to proceed with its plans to transmit unfiltered radio waves are astronomical. MedStar, a business located at Spokane Felts Field in Washington provides essential medical emergency transport for rural communities throughout north Idaho and north/central Washington. Their aircraft, both rotor wing and fixed wing, operate 24/7 365 days a year transporting critically ill and critically injured persons from remote locations to major hospitals located in Spokane and Seattle. Loss of reliable GPS signal would ground these aircraft indefinitely at immense human cost. Every law enforcement vehicle in Washington is equipped with a laptop and GPS. Dispatch of law enforcement units will become less reliable and less prompt should officers no longer have onboard GPS available. The costs of replacing or updating hardware in the several hundred squad cars and multiple law enforcement aircraft in eastern Washington must come with costs in terms of officers on the street. Washington State and every jurisdiction within Washington are in the midst of severe budget shortfalls. Imposing additional costs on already stretched budgets for public safety departments is absolutely not in the public interest. Fire departments, like the police, depend heavily upon GPS to minimize travel times to emergencies. Seconds count in a fire, just as they do in a fire fight. An FCC decision to permit LightSquared to damage all other GPS users is simply wrong.

GPS is pervasive in our economy. It is critical for surveying, engineering, construction of public works projects, farming, fisheries, fire fighting, public safety, all aspects of transportation, search and rescue, national defense, and for practically every other activity that involves precisely locating an object or place. An FCC decision to permit LightSquared to proceed with its plans amounts to gifting enormously valuable public spectrum to an individual private entity for its own profit. That is wrong, very wrong.

I urge you to reject LightSquared's petition based upon the results of numerous tests conducted under real conditions. It is abundantly clear that granting LightSquared's petition is not in the public interest, and that it will harm many individuals and seriously damage essential public services.

Should you decide to grant LightSquared's request, you should require that LightSquared fully compensate every individual, every jurisdiction, every State, and the Federal Government for 100% of all costs incurred to mitigate or correct the adverse impacts of their use of the radio spectrum.

This matter is of sufficient importance, having both significant local, regional, and national impacts, that the FCC should complete a full environmental impact statement in accordance with the National Environmental Policy Act to disclose the full effects of their decision upon the human environment.

Respectfully,

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